

**WATSTEIN**  
**TEREPKA** LLP

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Ryan Watstein  
Ryan@wtlaw.com  
404-782-0695

June 27, 2025

**VIA ECF**

Hon. Edgardo Ramos  
U.S. District Court for the Southern District of New York  
40 Foley Square  
Courtroom 619  
New York, NY 10007

**Re: *Brous v. Eligo Energy, LLC, 24 Civ. 1260*  
Unopposed Extension Request to Respond to ECF No. 240, Renewed Letter Motion to  
Compel Complaint-Related Discovery**

Dear Judge Ramos:

We represent Defendants Eligo Energy, LLC and Eligo Energy NY, LLC in the above dispute and submit this unopposed extension request. Pursuant to Rule I.E of Your Honor's Individual Practices, we respectfully request that Defendants' current response deadline to Plaintiffs' renewed letter-motion to compel complaint-related discovery (ECF No. 240) be extended two weeks to July 11, 2025.

Good cause exists for this request. Defendants need additional time to prepare their response to the renewed letter-motion because they have been working on multiple discovery issues in this very case, as evidenced by Plaintiffs' letter-motion filed last night. *See* ECF No. 241 at 1 ("Plaintiffs anticipate filing at least one Local Rule 37.2 discovery letter next week and believe others may follow . . ."). Additional time is also needed because defense counsel have several preexisting conflicts in other matters, including briefing for several dispositive motions and depositions. Additionally, defense counsel have been covering for several members of their firm who have been or who are still out of the office for personal matters.

This is the first request for an extension of time concerning this letter-motion. Plaintiffs consent to the relief requested.

Respectfully,

*/s/ Ryan Watstein*  
Ryan Watstein

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**Atlanta**  
75 14th Street NE, Ste. 2600  
Atlanta, GA 30309

**Los Angeles**  
515 S. Flower Street, 19th Floor  
Los Angeles, CA 90071

**Miami**  
218 NW 24th Street, 3rd Floor  
Miami, FL 33127